

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SAINT LAWRENCE COMMUNICATIONS LLC,)
)
)
Plaintiff,) CIVIL ACTION NO. 2:15-cv-00349-JRG-
) RSP
v.)
) PATENT CASE
ZTE CORPORATION ET AL.)
) JURY TRIAL DEMANDED
Defendants.)
)
)
)

**DEFENDANTS ZTE (USA), INC., ZTE CORPORATION, AND ZTE (TX) INC.’S
NOTICE OF FILING OF PETITIONS FOR *INTER PARTES* REVIEW**

Defendants ZTE USA, Inc., ZTE Corporation, and ZTE (TX) Inc. (collectively, “ZTE”) hereby notify the Court that, on March 10, 2016, ZTE USA, Inc. as the Petitioner and ZTE Corporation and ZTE (TX) Inc. as the real-parties-in-interest filed two petitions for *Inter Partes* Review (“IPR”) of U.S. Patent Nos. 7,151,802 (“the ’802 patent”) and 7,260,521 (“the ’521 patent”) with the Patent Trial and Appeal Board (“PTAB”) at the U.S. Patent and Trademark Office pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42.100 *et seq.*

The above-referenced patents are two of the five patents that Plaintiff Saint Lawrence Communications LLC (“SLC”) is currently asserting against ZTE in the present lawsuit, according to SLC’s Disclosure of Asserted Claims and Infringement Contentions Against ZTE and Identification of Document Production Accompanying Disclosure served on August 17, 2015. The PTAB will decide whether to institute the IPR proceedings on the ’802 and ’521

patents by, at the latest, September 18, 2016—six (6) months after the PTAB issued the Notices of Filing Date Accorded for the IPR petitions on the '802 and '521 patents, each dated March 18, 2016 (therefore, the PTAB will issue its Decisions on Institution by September 18, 2016).

SLC currently asserts claims 1-3, 8-11, 16, 25-27, 32-35, 40, 49-50, and 52-53 of the '802 patent against ZTE. In the IPR petition against the '802 patent, ZTE requested that claims 1-3, 8-11, 16, 25-27, 32-35, 40, 49, and 52-53 be cancelled as invalid and unpatentable under 35 U.S.C. § 103. Thus, ZTE has requested that all asserted claims of the '802 patent be cancelled as invalid and unpatentable. The IPR proceeding for this IPR petition against the '802 patent has been assigned Trial No. IPR2016-00704.

SLC currently asserts claims 1, 2, 5-8, 10, 11, 14, 15, 17, 28, 29, 32, 33, 35, 37, 38, 41, 42, 44, 55, 56, 59, 60, and 62 of the '521 patent against ZTE. In the IPR petition against the '521 patent, ZTE requested that claims 1, 2, 5, 7, 8, 55, 56, 59, and 62 be cancelled as invalid and unpatentable under 35 U.S.C. § 102 and claims 6, 10, 11, 14, 15, 17, 28, 29, 32, 33, 35, 37, 38, 41, 42, 44, and 60 be cancelled as invalid and unpatentable under 35 U.S.C. § 103. Thus, ZTE has requested that all asserted claims of the '521 patent be cancelled as invalid and unpatentable. The IPR proceeding for this IPR petition against the '521 patent has been assigned Trial No. IPR2016-00705.

Date: March 23, 2016

Respectfully Submitted,

/s/ Lionel M. Lavenue

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Counsel for Defendants
ZTE USA, Inc., ZTE Corporation, and
ZTE (TX) Inc.

CERTIFICATE OF SERVICE

I, Lionel M. Lavenue, Esquire, hereby certify that on March 23, 2016, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ *Lionel M. Lavenue*
Lionel M. Lavenue, Esq.